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January 30, 2025

VIA ECF

Hon. Miroslav Lovric
U.S. Magistrate Judge
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *Honeywell International Inc. v. Buckeye Partners, L.P. et al.*
Index No.: 5:18-cv-00646-FJS-ML
Joint Status Report and Request to Extend Mediation Deadline

Your Honor,

I write on behalf of the YAD Defendants, Buckeye parties and ExxonMobil to provide a joint status report and also request an extension of the current mediation deadline.

Since December, the parties have been engaged in mediation with mediator Last through several sessions. Our current court-ordered mediation deadline expires tomorrow. The parties request that the mediation deadline be extended another 30 days to accommodate further settlement discussions. Respectfully, the parties submit that there is no prejudice to anyone if this deadline is extended and they do not ask that any other remaining deadline be extended.

If the matter cannot be resolved in mediation, the parties anticipate timely finishing up remaining discovery, including Rule 30(b)(6) testimony, before the pending March 11, 2025 discovery deadline.

Respectfully submitted,
THE WLADIS LAW FIRM, P.C.
/s/ Timothy J. Lambrecht
Timothy J. Lambrecht (#510390)
Kevin C. Murphy (#508134)
for Third-Party YAD Defendants

TL/mms

Cc: All Counsel of Record via CM/ECF